Lathrop Telephone Company

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Washington, D.C. 20554

**CPNI Compliance Certification** As Required by FCC Enforcement EB-06-TC-060 Lathrop Telephone Company

Bureau, DA 06-223

499 ID # 802488

## LATHROP TELEPHONE COMPANY **CERTIFICATION OF CPNI FILING (February 2, 2006)**

- Lathrop Telephone Company ("LTC") (499 ID # 802488) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Commission's rules.
- 2. LTC does not use CPNI for marketing purposes. Accordingly, LTC's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, LTC has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These procedures include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.
- 3. This certification is signed below by an officer of Lathrop Telephone Company, who has personal knowledge that LTC has established procedures that are adequate to ensure compliance with the CPNI rules currently in effect and the statements contained in this filing are correct.

S/Via ECFS on 2/2/06; Original on file at company

Title Secretary

"First telephone company in Missouri to provide all push-button telephones as standard service

## Statement of Explanation: CPNI Compliance

This accompanying statement explains how Lathrop Telephone Company operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

Lathrop Telephone Company adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Lathrop Telephone Company does not use CPNI other than those legally allowable under Section 64.2005. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
  - The implementation of an express disciplinary process for CPNI violations;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and The establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.